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Attorneys for Defendant and Counterclaimant
LEAPFROG ENTERPRISES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WORDTECH SYSTEMS INC. and QUINTAL
RESEARCH GROUP, INC.,

Plaintiffs,

v.

LEAPFROG ENTERPRISES, INC., a Delaware
corporation doing business in California and Does
1-50,

Defendant.

AND RELATED COUNTERCLAIMS

Case No.: 11-cv-3771-WHA

~~PROPOSED~~ ORDER RE: SCHEDULE
FOR CLAIM CONSTRUCTION

JUDGE: HON. WILLIAM ALSUP

ACTION FILED: AUGUST 1, 2011
TRIAL DATE: NONE

Pursuant to the Court's Case Management Order And Reference To Magistrate Judge For
Mediation/Settlement (Dckt No. 34), plaintiffs Wordtech System, Inc. and Quintal Research Group,
Inc., and defendant Leapfrog Enterprises, Inc. propose the following claim construction schedule.

Event/Filing	Date	Rule
Last day for Defendant to serve its preliminary invalidity contentions and produce documents	May 1, 2012	Established by the Court Patent L.R. 3-3; 3-4
Last day for parties to exchange proposed terms and claim elements for construction	May 15, 2012	Patent L.R. 4-1
Last day for parties to exchange preliminary claim constructions and extrinsic evidence	June 5, 2012	Patent L.R. 4-2
Last day for parties to file Joint Claim Construction And Prehearing Statement	June 27, 2012	Patent L.R. 4-3
Last day to complete claim construction discovery	July 27, 2012	Patent L.R. 4-4
The parties to simultaneously serve claim construction briefs	August 10, 2012	Patent L.R. 4-5(a); Agreement by the parties
The parties to simultaneously serve responsive claim construction briefs	August 24, 2012	Patent L.R. 4-5(b); Agreement by the parties
No reply briefs except with leave of the Court.		Patent L.R. 4-5(c); Agreement by the parties
Claim Construction Tutorial	September 12, 2012	Established by the Court
Claim Construction Hearing	September 26, 2012	Established by the Court

RESPECTFULLY SUBMITTED BY:

DATE: February 29, 2012

/s/ Marilyn H. Riddervold
Marilyn H. Riddervold
Attorney for Plaintiff,
WORDTECH SYSTEMS, INC.

DATE: February 29, 2012

/s/ Richard Esty Peterson
Richard Esty Peterson
Attorney for Plaintiffs,
QUINTAL RESEARCH GROUP, INC.

DATE: February 29, 2012

/s/ Robert J. Artuz
Robert J. Artuz
Attorney for Defendant,
LEAPFROG ENTERPRISES, INC.

General Order 45 Attestation of Signatures

I, Marilyn H. Riddervold, as the ECF user and filer of this document attest that the concurrence in the filing of this document has been obtained from the other signatories, which shall serve in lieu of their signatures.

/s/ Marilyn H. Riddervold
Marilyn H. Riddervold
Attorney for Plaintiff,
WORDTECH SYSTEMS, INC.

IT IS SO ORDERED.

Dated: March 2, 2012.

